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10 **UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

11 JEANNETTE CLARK, individually
12 and on behalf of those similarly

CASE NO. 13-cv-485 JM (JMA)

13 situated,

14 Plaintiff,

15 vs.

16 LG ELECTRONICS U.S.A., INC.,

17 Defendant.
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20 **DECLARATION OF CLASS ACTION ADMINISTRATOR REGARDING CLAIM**
21 **FORMS FILED FOR THE CLASS ACTION SETTLEMENT**

22 I, Josephine Bravata, declare as follows:

23 1. I submit this declaration to provide the Court with information regarding the
24 claim forms filed for this class action settlement pursuant to Paragraph 3.9 of the Settlement
25 Agreement. I am over 21 years of age and am not a party to this action. I have personal
26 knowledge of the facts set forth herein.
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1 2. I am the Quality Assurance Manager of Strategic Claims Services (“SCS”), a
2 nationally recognized class action administration firm. I have over thirteen years of experience
3 specializing in administration of class actions. SCS was established in April 1999 and has
4 administered over three hundred (300) class action cases since its inception.
5

6 3. SCS was appointed to provide administrative services as part of the settlement
7 administration process in the above-captioned litigation. Our services include providing notice
8 of the Pendency and Proposed Settlement of Class Action to the States’ Attorneys General
9 pursuant to CAFA; providing Notice and the Claim Form to the Settlement Class; establishing
10 and maintaining the specially established settlement website
11 (www.lgrefrigeratorsettlement.com); establishing and monitoring the specially established toll-
12 free hotline (855-853-7442); arranging for publication of the Summary Notice; tracking requests
13 for exclusion and objections; distributing, accepting and processing Claim Forms filed by class
14 members; reviewing submitted Claim Forms for accuracy, completeness and merit; providing
15 notices to those claims that are deficient or rejected, when appropriate; and all other services
16 necessary to administer this class action (“Settlement”).
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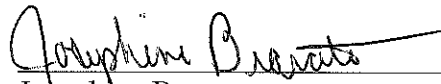
18 4. Through April 11, 2015, the deadline for claim form submissions, 10,305 timely
19 claim forms (“claims”) have been submitted. SCS is currently reviewing, processing and
20 analyzing all of these claims. SCS has and will be in close contact with the parties to this
21 settlement in reviewing the claim forms. SCS’s Report of the Claims Administrator is attached
22 hereto as **Exhibit A** and described below.
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24 5. The Report of the Claims Administrator sets forth the claims submitted to SCS as
25 follows:
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- 1 a. REPAIR ONLY CLAIMS: SCS has identified 6,082 claims submitted for a
2 repair only. SCS has been reviewing these claim forms and on February 13,
3 2015, began submitting approved repair requests to Defense Counsel on a
4 rolling basis so that LG/Sears could begin the repair process even before an
5 order finally approving the settlement is entered.
6
- 7 b. REIMBURSEMENT ONLY CLAIMS: SCS has identified 1,946 claims
8 submitted for reimbursement only. The total of reimbursement requested by
9 these claimants is \$858,726.42¹. SCS's review is ongoing and it has not yet
10 made a final determination on the validity of each claim.
11
- 12 c. REPAIR AND REIMBURSEMENT CLAIMS: SCS has also identified 2,277
13 claims that request both repair and reimbursement. As stated above in
14 paragraph 5a, the repair requests have been sent to LG/Sears on a rolling
15 basis; however, SCS has not yet determined whether the claims for
16 reimbursement are valid. The total of reimbursement requested by these
17 claimants is \$882,246.79².

18 6. I declare under penalty of perjury that the foregoing is true and correct.
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20 Executed this 4th day of May 2015, in Media, Pennsylvania.
21

22 
23 Josephine Bravata
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26 ¹ Pursuant to the Settlement Agreement paragraph 2.2, individual claims have been capped at \$5,000 per
27 Refrigerator.

28 ² Pursuant to the Settlement Agreement paragraph 2.2, individual claims have been capped at \$5,000 per
Refrigerator.

EXHIBIT “A”

EXHIBIT A

REPORT OF THE SETTLEMENT ADMINISTRATOR

CLARK V. LG SETTLEMENT

TOTAL # OF CLAIMS..... 10,305

TOTAL # OF TIMELY REPAIR ONLY CLAIMS..... 6,082

TOTAL # OF TIMELY REIMBURSEMENT ONLY CLAIMS..... 1,946
REIMBURSEMENT AMOUNT REQUESTED..... \$858,726.42

TOTAL # OF TIMELY REPAIR AND REIMBURSEMENT CLAIMS..... 2,277
REIMBURSEMENT AMOUNT REQUESTED..... \$882,246.79